

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DUSTIN ETTER

v.

JEROD P. FURR, et al.

§
§ Bankruptcy Case no. 25-30155
§ Adversary Case No. _____
§
§

NOTICE OF REMOVAL

Notice is hereby given pursuant to 28 USC §§ 1334, 1441, 1446, and 1452 that Plaintiff Dustin Etter hereby removes this action (with state court Cause No. 24-07-11639) from the 457th District Court of Montgomery County, Texas to the United States Bankruptcy Court for the Southern District of Texas, Houston Division. As further explained below, this case is primarily being removed because it under 28 USC § 1452 because it pertains to the bankruptcies of Alliance Energy Partners, LLC (“AEP”) and Alliance Farm & Ranch, LLC (“Alliance Farm”) which are both currently pending in the Houston Division of the Southern District of Texas. In particular, but without limitation, this bankruptcy includes claims seeking control over AEP and against Alliance Farm. In support, Plaintiff would show as follows:

I. PARTIES, COUNSEL, AND STATUS OF SERVICE

1. Pursuant to Local Rule 9027-1(a), the parties in this case—all of whom are represented by counsel and have either been served or who have waived service by appearance—with their respective counsel listed below, are as follows:

Plaintiff Dustin Etter

Noah E. W. Meek
Irelan McDaniel, PLLC
2520 Caroline, 2nd Floor
Houston, Texas 77004
Phone: (713) 222-7666

Defendant Jerod P. Furr
Defendant Corrina Furr
Defendant AE Partners Holdings, Inc.
Defendant AEP Asset Holdings, LLC
Defendant Alliance Energy Partners, LLC
Defendant Invictus Drilling Motors, LLC
Defendant Alliance Farm & Ranch, LLC
J. Randall Bays & Alyssa M. Cuellar
1503 Hailey St.
Conroe, Texas 77301
Phone: (936) 760-7670

Deborah L. Crain
E-Merger Law, PLLC
1334 Brittmoore, Suite 2314
Houston, Texas 77043
Phone: (346) 535-0818

Defendant Connect Realty.com, Inc.
Defendant Heaven Lee Properties, LLC d/b/a Lux Group TX
Defendant Jeana Lea Hurley
Branch M. Sheppard & Sara Morton
1001 McKinney, Suite 1500
Houston, Texas 77002
Phone: (713) 335-2150

II. STATE COURT ACTION & GROUNDS FOR REMOVAL JURISDICTION

2. On July 29, 2024, Plaintiff filed Plaintiff's Original Petition in 457th District Court of Montgomery County, Texas. Plaintiff's current live pleading is Plaintiff's Eighth Amended Petition.

3. Plaintiff's claims include claims against and seeing the establishment of an interest in money and property of Alliance Farm. Plaintiff's claims also include claims against AEP and claims to rescind, reform, or impose a constructive trust over shares of AEP or its current parent company which would give Plaintiff effective majority shareholder control over AEP. This Court therefore has removal jurisdiction over this action pursuant to 28 USC §§ 1334 and 1452. This action includes both core and non-core claims.

III. STATEMENT REGARDING CONSENT TO ENTRY OF JUDGMENT

4. Pursuant to FED. R. BANKR. P. 9027(a)(1)(B), Plaintiff does consent to the bankruptcy court's entry of a final judgment or order.

IV. DOCKET SHEET AND STATE COURT FILINGS

5. Pursuant to Local Rule 9027-1(b), a copy of the state court docket sheet and all state court filings are being filed with this notice of removal.

Respectfully submitted,

IRELAN McDANIEL, PLLC

By: /s/ Noah Meek

Noah E. W. Meek
State Bar No. 24084554
Email: nmeek@imtexaslaw.com
2520 Caroline St., 2nd Floor
Houston, Texas 77004
Phone: (713) 222-7666
Fax: (713) 222-7669

**ATTORNEYS FOR PLAINTIFF
DUSTIN ETTER**

CERTIFICATE OF SERVICE

This is to certify that on May 20, 2025, a true and correct copy of this instrument was served upon all parties in compliance with the Federal Rules of Bankruptcy Procedure.

/s/ Noah Meek

Noah Meek